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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

HEATHER BOONE and ROXANNE
RIVERA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff,

v.

AMAZON.COM SERVICES, LLC,

Defendant.

Case No. 1:21-CV-00241-NODJ-BAM – LEAD
Case No. 1:22-CV-00146-NODJ-BAM-MEMBER

**DECLARATION OF CRISTIAN BARRERA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF CRISTIAN BARRERA

I, Cristian Barrera, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1 1. I have personal knowledge of the following facts and if called as a witness, I could
2 and would testify competently.

3 2. I am a former employee of Amazon. Specifically, I worked for Amazon as an hourly,
4 non-exempt employee in California.

5 3. Following the outbreak of the COVID-19 pandemic, Amazon instituted a company-
6 wide policy requiring its hourly, non-exempt employees at its fulfillment centers and distributions
7 centers to undergo a COVID-19 screening prior to the start of their scheduled shifts. These screenings
8 were required by Amazon, were conducted on the premises of Amazon, and were controlled by
9 Amazon. Unfortunately, Amazon did not automatically pay for the time spent by its employees
10 completing the COVID-19 screenings and employees, like me, were not paid for all of the time spent
11 completing the COVID-19 screenings.

12 4. Accordingly, a lawsuit was filed against Amazon. I am a named plaintiff in this action
13 and I am represented by The Nourmand Law Firm, APC. Since the beginning, I have actively
14 participated in this case during the past three years by assisting the attorneys and their staff in the
15 investigation and information gathering associated with this action. Since I have been a named
16 plaintiff, I have understood that it was my duty to serve the interests of all the workers involved in
17 this lawsuit and not just my own interests. My attorneys explained this to me. I have had no conflicts
18 of interests that have interfered with my duty to serve the entire class.

19 5. I know that Amazon is one of the largest companies in the nation. However, this
20 lawsuit was to help Amazon workers recover their unpaid wages. I understand the role of a class
21 representative is important and I chose to take on that role to make a positive impact beyond my
22 own claims and interests, in order to assist and aid the Class Members who may not have brought
23 claims on their own. I knew and understand that I would be required to hold the Class Members'
24 interests in equal, if not higher, regard than my own.

25 6. I believe the settlement is fair and reasonable in light of the circumstances. I have
26 had discussions with my lawyers about the settlement, and I have reviewed the settlement papers
27 with them. I believe that the settlement is in the best interest of the Class Members.

1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Dated 09/24/2024.

4 
5 CRISTIAN BARRERA